

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, et al,

Defendants.

No. 24-cv-10049-LJL (lead case)
No. 25-cv-449 (LJL) (member case)

JENNIFER ABEL,

Third-Party Plaintiff,

v.

JONESWORKS LLC,

Third-Party Defendant.

WAYFARER STUDIOS LLC, et al.,

Consolidated Plaintiffs,

v.

BLAKE LIVELY, et al.

Consolidated Defendants.

**DECLARATION OF STEPHANIE A ROESER
IN SUPPORT OF BLAKE LIVELY'S MOTION TO COMPEL**

I, Stephanie A. Roeser, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Manatt, Phelps & Phillips LLP, located at 2049 Century Park East, Suite 1700, Los Angeles, CA 90067, and counsel of record for Blake Lively in the above-captioned action.

2. I respectfully submit this declaration in support of Ms. Lively's Reply in further support of her Omnibus Motion to Compel the Wayfarer Defendants' compliance with discovery.

3. I also submit this declaration to place before the Court true and correct copies of the following documents.

4. A compendium of Ms. Lively's Requests to Wayfarer that Ms. Lively asserts require responses through the present (and for which equivalent Requests exist for the remaining Wayfarer Defendants), is attached hereto as Exhibit A.

5. A true and correct copy of text messages, dated December 15, 2022, produced by third party AJ Marbory in this litigation, bearing the Bates stamp MARBORY_000001360, is attached hereto as Exhibit B.

6. A true and correct copy of text messages, dated February 28, 2024, produced by the Wayfarer Parties in this litigation, bearing the Bates stamp WAYFARER_000139913, is attached hereto as Exhibit C.

7. A true and correct copy of text messages, dated November 20, 2023, produced by Defendant Jamey Heath in this litigation, bearing the Bates stamp HEATH_000033041, is attached hereto as Exhibit D.

8. A true and correct copy of text messages, dated March 19, 2024, produced by Mr. Heath in this litigation, bearing the Bates stamp HEATH_000034652, is attached hereto as Exhibit E.

9. A true and correct copy of text messages, dated July 26, 2024, produced by third party Breanna Butler Koslow in this litigation, bearing the Bates stamp BBKOSLOW-000008756, is attached hereto as Exhibit F.

10. A true and correct copy of text messages, dated August 27, 2024, produced by Ms. Koslow in this litigation, bearing the Bates stamp BBKOSLOW-000008788, is attached hereto as Exhibit G.

11. A true and correct copy of text messages, dated January 21, 2025, produced by Ms. Koslow in this litigation, bearing the Bates stamp BBKOSLOW-000008758, is attached hereto as Exhibit H.

12. A true and correct copy of text messages, dated December 7, 2022, produced by Defendant Justin Baldoni in this litigation, bearing the Bates stamp BALDONI_000018802, is attached hereto as Exhibit I.

13. A true and correct copy of text messages, dated December 4, 2023, produced by Mr. Baldoni in this litigation, bearing the Bates stamp BALDONI_000021154, is attached hereto as Exhibit J.

14. A true and correct copy of an email chain with the end date of May 7, 2025, between myself, other counsel for Ms. Lively, and counsel for the Wayfarer Parties, is attached hereto as Exhibit K.

15. A true and correct copy of an email chain with the end date of May 21, 2025, between my co-counsel at Willkie Farr & Gallagher LLP, Ms. Bender, and counsel for the Wayfarer Parties, is attached hereto as Exhibit L.

16. A true and correct of an email dated August 13, 2025, from counsel for Ms. Lively to the Wayfarer Parties, is attached hereto as Exhibit M.

Dated: August 13, 2025

/s/ Stephanie A. Roeser
Stephanie A. Roeser